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6 *Attorney for Helen Tang*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 **SECURITIES AND EXCHANGE**  
10 **COMMISSION,**

Plaintiff,  
11 vs.

12 **EDWIN YOSHIHIRO FUJINAGA; and**  
**MRI INTERNATIONAL, INC.,**

13 Defendants,  
and

14 **CSA SERVICE CENTER, LLC;**  
**THE FACTORING COMPANY;**  
**JUNE FUJINAGA; and**  
**THE YUNJU TRUST,**

15 **Relief Defendants.**

16 Case No.: 2:13-cv-01658-JCM-CWH

17 **AMENDED STIPULATION AND**  
**ORDER TO EXTEND HELEN**  
**TANG'S DEADLINE TO FILE A**  
**RESPONSE TO THE RECEIVER'S**  
**MOTION**

18 **(FIRST REQUEST)**

19 Helen Tang ("Ms. Tang"), by and through her counsel Daniel W. Glasser of the law firm  
20 of Chipman Glasser, LLC on the one hand, and Robb Evans & Associates LLC, as receiver (the  
21 "Receiver") by and through its counsel, Michael F. Lynch of the Lynch Law Practice, PLLC on  
22 the other hand, hereby stipulate to the following:

23 1. That the Receiver filed its *Motion for Order Authorizing, Directing, and*  
*Requiring Rabobank, N.A. and Helen Tang to Immediately Turn Over to the Receiver All*  
*Proceeds from the Sale of One Stop Pharmacy*, on December 20, 2017 (ECF No. 464) (the  
24 "Motion"). The Receiver filed and served upon Ms. Tang by mail, its Notice of Motion and  
25 Opportunity to Object on December 21, 2017. (ECF Nos. 466, 468);

26 2. That Ms. Tang's response to the Motion was due January 8, 2018. (Fed. R. Civ. P.  
27 6(d) and LR 7-2);

1           3. That the parties' original Stipulation and Order filed January 8, 2018 (ECF  
2 No. 472) mistakenly proposed the court holiday January 15 as the deadline, and thus the parties  
3 hereby submit this Amended Stipulation and Order stipulating to a January 16, 2018 deadline;

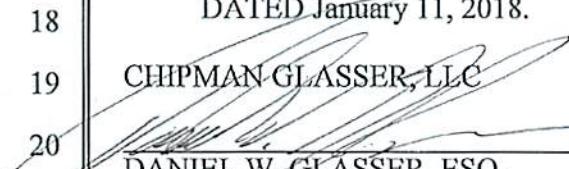
4           4. That Ms. Tang requires additional time beyond the original deadline in light of the  
5 following: (a) the Receiver's Motion was filed just before the year-end holidays, during which  
6 time the undersigned attorneys' and their staffs' regular work schedules were altered and reduced  
7 in advance where feasible, (b) Ms. Tang expended reasonable efforts to retain counsel and  
8 retained Mr. Glasser on January 5, 2018, and (c) Mr. Glasser has thereby had insufficient time to  
9 become fully familiar with the issues raised in the Motion and prepare a substantive response;

10          5. That it is appropriate under the circumstances to allow Ms. Tang's above-  
11 referenced counsel up to and including Tuesday, January 16, 2018 to file a response to the  
12 Motion on behalf of Ms. Tang; and

13          6. That, subject to entry of the order proposed below, the deadline to respond to the  
14 Receiver's Motion shall be extended for Ms. Tang only, as follows:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
16          Ms. Tang's deadline to file a response to the 17          Receiver's Motion	01/08/2018	01/16/2018

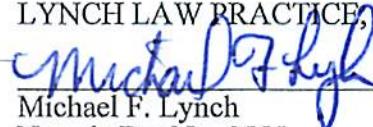
18          DATED January 11, 2018.

19            
CHIPMAN GLASSER, LLC

20          DANIEL W. GLASSER, ESQ.  
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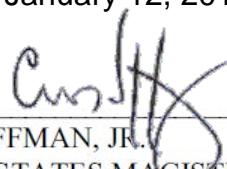
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*Attorney for the Receiver  
Robb Evans & Associates LLC*

IT IS SO ORDERED.

DATED: January 12, 2018

  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE